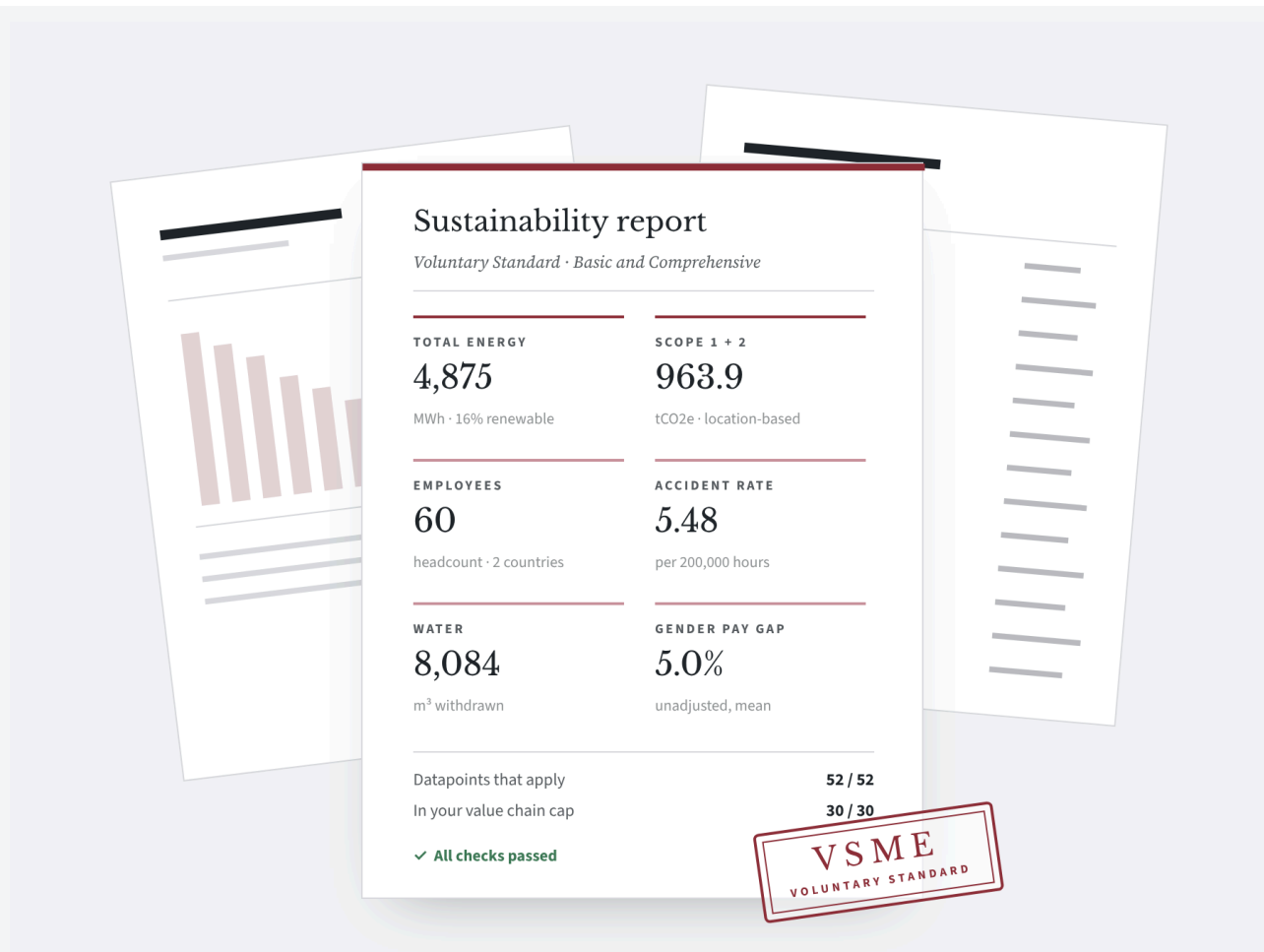


VSME Reporting Suite

how to use it, step by step

Prepare your sustainability report under the Voluntary Standard –
Commission Delegated Regulation (EU) 2026/1560 – from your bills, logs
and payroll register, in thirteen steps.



What this guide covers

This guide walks you through the workbook in the order you will use it. Read sections 1 to 3 once, then keep the step pages open beside the workbook while you work.

1	Before you start	What the workbook does and does not do, how it is laid out, the colour key
2	The Voluntary Standard in two pages	Options A and B, datapoint types, the 10-employee relief and the value chain cap
3	Gather your information	A checklist of the documents and data each tab needs
4	The thirteen steps	Setup, Sites, Policies, Energy & GHG, Climate, Environment, People, Workforce, Governance, Evidence, Index, Dashboard, Report
5	Getting the numbers right	Emission factors, gas and electricity, refrigerants, estimates
6	Review, approve and share	The finishing checklist, printing the report and next year
7	Questions and answers	Common questions from SMEs, finance teams and advisers

This guide describes Edition 1.0 of the workbook (October 2026). References such as “¶32” are to Annex I of Commission Delegated Regulation (EU) 2026/1560 (the Voluntary Standard), published in the Official Journal on 21 September 2026. “EFRAG’s guidance” is EFRAG’s non-mandatory guidance to the Voluntary Standard. The worked example in the workbook – Ardculen Packaging Ltd – is fictitious.

What you are working with

The VSME Reporting Suite is a do-it-yourself Excel workbook. You enter what you already have; it calculates the metrics, tracks every disclosure of the Voluntary Standard, keeps an evidence trail and lays out the report.

What it does

- Converts fuel, vehicle, refrigerant and electricity data into MWh and tonnes of CO2 equivalent, using SEAI, DESNZ and IPCC factors kept in a factor library.
- Calculates the workforce metrics from an employee register of up to 1,000 people: breakdowns, accident rate, minimum wage test, pay gap, collective bargaining coverage, training and turnover.
- Tracks the Standard as 59 datapoints – which apply to you, which are reported, which sit in your value chain cap – plus 6 optional extras that lenders still ask for.
- Keeps an owner, a source and a review status for every datapoint, with a findings log.
- Runs 17 checks and lays out the report, with a generated statement of compliance, ready to print or save as PDF.

What it does not do

- It does not prepare the report for you or give assurance. You prepare the report and remain responsible for it; Wide GAAP does not review the figures you enter.
- It is not EFRAG's Digital Template and does not produce XBRL. If a customer asks for the digital format, transfer the figures from the Report tab.
- It does not choose Scope 3 factors for you – Scope 3 is optional, and the Climate tab multiplies the amounts and factors you supply.
- It does not replace the Standard, EFRAG's guidance or professional judgement.

What you need

Microsoft Excel 2010 or later for Windows, or Excel 2011 or later for Mac. There are no macros, so nothing needs to be enabled.

How the workbook is laid out

TABS	WHAT THEY ARE FOR
Cover, Instructions	Contents with links to every tab, how to use the workbook, the requirements it applies and its judgements and limitations.
Setup to Report (13 tabs)	Your working paper – the steps in section 4 of this guide. Fill them in order.
Factor library	Every emission and energy factor the calculators use, with its source. Rose rows let you add your own.
VS v VSME 2024	What changed between EFRAG's VSME (December 2024) and the Voluntary Standard – useful when a customer's questionnaire still quotes VSME.
Example – ... (13 tabs)	The same thirteen steps completed for a fictitious Irish corrugated packaging maker with 60 employees, three sites and Option B. Open any of them to see what a finished tab looks like.

The colour key

Type here	Input cell, framed in rose – the only cells you fill in.
1,234	Calculated cell, protected so formulas are not overwritten (Review ► Unprotect Sheet; there is no password).
✓ OK	Row check. It shows ○ while something is still to fill in and ✕ in burgundy when something needs attention.

The status line

The top right of every tab shows the overall status of the workbook:

- **Waiting for inputs** – Setup is not complete yet.
- ✕ **3 check(s) need attention** – open the Dashboard to see which.
- ✓ **All checks passed** – every check is clear.

Each tab also has ‹ previous, Contents and next › links in its top row.

Start here Save a copy of the workbook under your company name and year before you type anything. Then spend ten minutes clicking through the Example tabs: seeing a finished report first makes every step quicker.

The rules the workbook applies

What the Standard is

The Voluntary Standard is the sustainability reporting standard for voluntary use set out in Annex I to Commission Delegated Regulation (EU) 2026/1560. It was published in the Official Journal on 21 September 2026 and entered into force on 24 September 2026. It replaced Commission Recommendation (EU) 2025/1710, which was the Commission’s adoption of EFRAG’s VSME standard of December 2024 – which is why many people still call it “VSME”.

It is intended for undertakings that, on their balance sheet dates, do not exceed an average of 1,000 employees during the preceding financial year (¶12). It is voluntary and no assurance is required. No double materiality assessment is required either: a disclosure applies, or it does not, under the “if applicable” principle.

Option A or Option B

OPTION	WHAT YOU REPORT
Option A – Basic Module only	B1 Basis for preparation · B2 Practices, policies and future initiatives · B3 Energy and GHG emissions · B4 Pollution · B5 Biodiversity · B6 Water · B7 Resource use, circular economy and waste · B8 Workforce characteristics · B9 Health and safety · B10 Remuneration, collective bargaining and training · B11 Corruption and bribery.
Option B – Basic and Comprehensive Modules	Everything in Option A, plus C1 Business model and strategy · C2 Description of practices and policies · Scope 3 (optional) · C3 GHG reduction targets and transition plan · C4 Climate risks · C5 Additional workforce characteristics · C6 Human rights policies · C7 Human rights incidents · C8 Revenues from certain activities · C9 Board gender diversity.

Once chosen, a module is complied with in its entirety – but each disclosure is given only when it applies to you. The workbook works out applicability from your answers.

Three kinds of datapoint

ON THE INDEX	MEANING
Shall	Essential: report it if your module includes it.
If applicable	Report it only in the circumstances the Standard describes – for example pollutants only if you already report them to an authority or under an environmental management system.
May	Voluntary.

Separately, 20 datapoints carry the tag **[Voluntary for undertakings with 10 employees or less]**. If your average in the preceding year was 10 or less, the workbook treats them as optional – unless you choose to report them anyway (Setup C).

The value chain cap – what a large customer can ask of you

Under the Omnibus I Directive (EU) 2026/470, an undertaking with an average of up to 1,000 employees in the preceding financial year that sits in the value chain of a company reporting under the CSRD is a “protected undertaking”. It has the right to decline to provide information beyond the voluntary standard when the request is made for the customer’s sustainability reporting, and the customer may not require more by contract. Member States must transpose these provisions by 19 March 2027.

Annex II to Regulation 2026/1560 lists the datapoints that form this “value chain cap” – one list for undertakings with 10 employees or less and a longer list for those with more than 10. Article 3 applies from financial years beginning on or after 1 January 2027.

In the workbook the Index shows both Annex II lists and, in the “In your cap” column, the one that applies to you. The Dashboard shows how many of your cap datapoints are reported. When a customer’s questionnaire asks for more, you know exactly which answers are within the cap.

The cap limits what a CSRD reporter may require for its sustainability reporting. It does not stop you sharing more voluntarily, and it does not affect information gathered for other purposes, such as due diligence or risk management. Banks, insurers and investors are still encouraged to limit their requests to the information in Annex I (recital 5).

Other rules worth knowing

TOPIC	THE RULE, AND WHERE THE WORKBOOK HANDLES IT
Statement of compliance	B1 now requires an explicit statement that the report complies with the Standard. Setup H generates it from your answers; it heads the Report tab.
Omitting information	¶22 allows omission only for (a) information seriously prejudicial to your commercial position, in exceptional cases, (b) trade secrets, (c) classified information, or (d) information protected by law, privacy or security. Each omitted datapoint is disclosed and reassessed every year (Setup G).
Comparatives	From the second year of reporting you give the previous year’s figures, except for metrics reported for the first time (¶14).
Financial statements	The report covers the same period as your financial statements and must be coherent with them (Setup A–B).
Guidance	EFRAG’s guidance to the Voluntary Standard is non-mandatory. The workbook follows it for formulas such as the accident rate, training hours and the pay gap, and tells you where it does.

The workbook also offers six extras from VSME (December 2024) that some banks still ask for: market-based Scope 2, GHG intensity per million of turnover, water withdrawal in high water-stress areas, training hours by gender, the area of sites in or near biodiversity-sensitive areas and the Paris-aligned benchmark exclusion test. They are clearly marked as beyond the Standard and appear only if you switch them on (Setup C).

Collect the paperwork first

Most of the time goes into finding documents, not typing them in. Ask for these at the start, and give each item an owner on the Evidence tab so you know who is fetching what.

TAB	WHAT TO COLLECT
Setup	Signed financial statements for the period (total assets, turnover, currency); legal form; NACE code(s); a one- or two-sentence description of your activities; the average number of employees in the preceding financial year; certificates such as ISO 14001; for consolidated reports, each subsidiary's registered address.
Sites	Every site you own, lease or manage: address, tenure, area in hectares and coordinates (a map app gives them); a check of each site against the Natura 2000 or national protected-area viewer and a water-stress tool such as WRI Aqueduct.
Policies	Your policies, procedures and plans for the ten sustainability issues; with Option B, a short description of each, your main products, markets, customers and an estimate of your number of suppliers.
Energy & GHG	Twelve months of electricity bills for every meter (kWh), gas bills (kWh as billed), fuel card statements and delivery dockets for diesel, petrol, gas oil, kerosene or LPG (litres), kilometres for vehicles without fuel data, solar generation readings, your supplier's fuel mix disclosure or Guarantees of Origin statements, and the F-gas service log (kg topped up).
Climate	Option B only. Scope 3 activity or spend data and factors if you report it; any emission reduction targets with their base year; your transition plan, if any; your risk register for climate hazards and transition events.
Environment	Pollutant returns, if you file them under a licence or an environmental management system; water bills or meter readings (and your share of a shared building); waste transfer notes or weighbridge tickets with List of Waste codes and destinations; for manufacturing, construction or packaging, the annual mass of your main materials.
People	A payroll or HR export with one row per employee who worked for you at any time in the period: an ID (no names), gender, contract type, country of contract, FTE, start and leaving dates, reason for leaving, management level, collective agreement coverage, apprentice or intern, annual gross pay, contracted weekly hours and training hours.
Workforce	The accident book with days of absence for each case; hours worked from time and attendance or payroll (or your standard annual hours); the applicable minimum wage; the number of self-employed and agency workers at the period end.
Governance	Your legal register (convictions and fines for corruption or bribery); the code of conduct and grievance procedure; any formal findings on human rights; revenue by activity if you are in weapons, tobacco, fossil fuels or agrochemicals; the register of directors.

No names needed The employee register works with an ID per person. Keep personal data out of the workbook if you share it with an adviser or a customer.

From Setup to Report

Each step below matches one tab, in the order they appear in the workbook. For each, you will find what you enter, what the workbook works out for you, and what to check before moving on.

HOW IT WORKS • DO IT YOURSELF

From bills to boardroom, *in thirteen steps*

You enter the bills, the logs, the payroll register and a few answers. The workbook calculates the metrics, tracks every datapoint of the Voluntary Standard – and checks the lot.

I. THE BUSINESS AND ITS CARBON

- 01 Setup**
Undertaking, period, Option A or B, basis and size band B1
- 02 Sites**
Geolocation, biodiversity-sensitive areas and water stress
- 03 Policies**
Ten sustainability issues, targets and the business model B2 · C1 · C2
- 04 Energy & GHG**
Bills, fuel cards and the F-gas log, turned into MWh and tCO₂e B3
- 05 Climate**
Scope 3 by category, reduction targets and climate risks C3 · C4

II. NATURE, PEOPLE AND CONDUCT

- 06 Environment**
Pollution, water, waste, circular economy and materials B4-B7
- 07 People**
One row per employee, pasted from payroll – no names needed
- 08 Workforce**
Accident rate, minimum wage, pay gap, bargaining, training and turnover – calculated B8-B10 · C5
- 09 Governance**
Corruption and bribery, human rights, revenues and board diversity B11 · C6-C9

III. THE PROOF AND THE REPORT

- 10 Evidence**
An owner, a source and a review status for every datapoint
- 11 Index**
59 datapoints: does it apply, is it reported, is it in your value chain cap?
- 12 Dashboard**
Key figures, charts and 17 checks ✓
- 13 Report**
The statement of compliance and the full report, ready to print or save as PDF

BUILT ON Delegated Regulation (EU) 2026/1560 · mapped to VSME 2024

INCLUDED A complete worked example · Excel 2010+ · no macros



01

STEP 1 • SETUP

The undertaking and the report

General information for B1 and the settings every other tab uses. Complete it first – until it is done, the status line reads “Waiting for inputs”.

YOU ENTER

- **A The undertaking:** name, legal form (from the list in EFRAG’s guidance), its wording for the report, NACE code(s) such as C17.21, principal activities, country of primary operations, location of significant assets, currency, total assets and turnover from the financial statements, and the financial statements the report refers to.
- **B Period, option and basis:** start and end dates, whether this is your first year, Option A or B, individual or consolidated.
- **C Size and scope:** headcount or FTE, and the average number of employees in the preceding financial year; whether to report the [≤10] datapoints anyway; whether to add the lender extras.
- **D Calculation settings:** global warming potentials (AR5 or AR6), organisational boundary, accident rate per 200,000 or 1,000,000 hours, and whether turnover counts all leavers or permanent employees only.
- **E–G:** up to 5 certifications or labels, up to 8 subsidiaries (consolidated reports) and up to 6 omitted datapoints with their reason.

THE WORKBOOK DOES

- Reads the number of employees at the period end from the People tab.
- Works out your size band, whether you are within the intended scope and which value chain cap list applies.
- Generates the statement of compliance (section H) that heads the report.
- Checks dates (the period must end after it starts and last no more than 18 months), required fields and that each omission has a valid reason.

Before you move on Make sure turnover and total assets agree to the signed financial statements, and record your GWP, boundary, accident-rate and turnover choices – the report discloses them.

The undertaking and the report

General information for B1 and the settings every other tab uses. Complete it first – until it is done, the status line reads “Waiting for inputs”.

WORKED EXAMPLE – fictitious entity, for reference only – enter your own figures in the template tabs (without “Example”)

A The undertaking (B1 T27(a))

Name of the undertaking: Articulon Packaging Ltd. As registered.

Legal form (T27(a)(i)): Private limited liability undertaking. The categories used in EFRAG’s guidance.

Legal form – as worded in the report: Private company limited by shares (LTG), incorporated in Ireland. I.e. Private company limited by shares (LTG) designated activity company (DAC).

NACE code(s) (T27(a)(ii)): C17.21. Design and manufacture of corrugated cardboard boxes, shelf-ready packaging and protective inserts for food, drink and e-commerce customers in Ireland and the UK. I.e. Design and manufacture of corrugated cardboard boxes, shelf-ready packaging and protective inserts for food, drink and e-commerce customers in Ireland and the UK.

Principal activities: Design and manufacture of corrugated cardboard boxes, shelf-ready packaging and protective inserts for food, drink and e-commerce customers in Ireland and the UK. One or two sentences, used in the report.

Country of primary operations (T27(a)(iii)): Ireland.

Location of significant assets (T27(a)(iv)): Manufacturing plant and corrugator line at Ailly, Co. Kildare (owned); finished-goods warehouse at Naas, Co. Kildare (leased).

Monetary unit: EUR. Currency of the financial statements.

Total assets (T27(a)(v)): 14,260,000. Balance sheet total from the financial statements.

Turnover (T27(a)(vi)): 18,640,000. Net turnover from the financial statements.

Financial statements for the same period (T27): Audited financial statements for the year ended 31 December 2026. The report must be coherent with items, name them in a reader-friendly way.

B Reporting period, option and basis (B1 T27(a)-(c))

The period should match the financial statements (T18).

Start of the reporting period: 01 Jan 2026.

End of the reporting period: 31 Dec 2026.

Reporting period, as worded: 1 January 2026 to 31 December 2026. Calculated.

First year of reporting under the Standard? Yes. Consolidation figures are needed from the second year, except for metrics reported for the first year (T14).

Option selected (T27(a)): Option B – Basic and Comprehensive Modules. A. Basic Module only. B. Basic and Comprehensive Modules. A module is compiled with the report.

Basis of preparation (T27(c)): Individual. Individual: this undertaking only. Consolidated: with subsidiaries (recommended for parents, T16).

C Size and scope

The Standard is intended for undertakings with an average of up to 1,000 employees in the preceding financial year (T2).

Report employee numbers in: Headcount. Headcount or full-time equivalent (T27(a)(v), T45).

Number of employees at the end of the period (T27(a)(v)): 60. From the employee register (People tab), in the measure above.

Setup in the worked example: the undertaking, the period, Option B and the size settings.

02 STEP 2 • SITES

Sites owned, leased or managed

One row per site. The coordinates are a B1 datapoint; the last three columns feed biodiversity (B5) and water (B6).

YOU ENTER

- Up to 12 sites: name, tenure (owned, leased or managed), address, postcode, town, country.
- Latitude and longitude in decimal degrees with five decimal places, latitude first – for example 53.34981, –6.26031. A large site can be given as a point near its centre.
- Area in hectares.
- In or near a biodiversity-sensitive area (In, Near or No) and the area's name.
- Water-stress area (Yes or No).

THE WORKBOOK DOES

- Counts the sites and their total area.
- Lists the sites in or near a biodiversity-sensitive area on the Environment tab and in the report.
- Carries the water-stress answer to the water table, site by site.

Before you move on Check every site on a map viewer and note the date you checked. Biodiversity-sensitive areas include Natura 2000 sites (SACs and SPAs), UNESCO natural World Heritage sites, Ramsar sites, other protected areas, Key Biodiversity Areas and IUCN Red List habitats; “near” means partly overlapping or adjacent. For water stress, WRI Aqueduct baseline water stress of “High” (40–80%) or above, or an EEA WEI+ of 40% or more, counts.

VSME_Reporting_Suite_VS2026.xlsx

STEP 2: SITES

Sites owned, leased or managed

One row per site. Coordinates feed B1, the last three columns feed biodiversity (B5) and water (B6).

WORKBOOK EXAMPLE: Follows exactly, for reference only – enter your own figures in the template tabs (without “Example”).

✓ All checks passed

Autosave Packaging List

A: How to fill this in

Coordinates: decimal degrees with five decimal places (about one metre), latitude first – for example 53.34981, –6.26031. A large site can be given as a point near its centre. Biodiversity-sensitive areas (BSA) include Natura 2000 sites (SACs and SPAs), UNESCO natural World Heritage sites, Ramsar sites, other nationally protected areas, Key Biodiversity Areas and IUCN Red List habitats. “Near” means partly overlapping or adjacent, for a site further away you may also use its area of influence (buffer distances for your type of activity). Check the NPWS or national map viewer, the Natura 2000 viewer or the World Database on Protected Areas.

Water stress: mark Yes if the site lies in an area of high water stress – for example WRI Aqueduct baseline water stress of “High” (40–80%) or above, or an EEA water exploitation index (WEI+) of 40% or more. Most of Ireland and the UK is low, but check each site.

B: Sites

Site name	Tenure	Address	Postcode	Town or city	Country	Latitude	Longitude	Area (ha)	In or near a BSA?	Name of the biodiversity-sensitive area	Water stress area?	Status
Ally plant (manufacturing)	Owned	Unit 3, Barrowside Business Park, Kilsenny Road	R14	Ally, Co. Kildare	Ireland	52.88542	-6.97012	2.60	Near	River Barrow and River Nore SAC (Natura 2000)	No	✓ OK
Nass warehouse (finished goods)	Leased	Unit 14, Millbrook Logistics Park	W91	Nass, Co. Kildare	Ireland	53.21047	-6.69531	1.10	No		No	✓ OK
Dublin sales office (shared building)	Leased	Second floor, 40 Harcourt Road	D02	Dublin 2	Ireland	53.33412	-6.26251	0.02	No		No	✓ OK
Sites listed	3							Total area	3.72			

Environment People Workforce Governance Evidence Index Dashboard Report Factor library VS v VSME 2024 Example – Setup Example – Sites

Sites: coordinates, tenure, area and the biodiversity and water-stress answers.

03

STEP 3 • POLICIES

Practices, policies and the business model

B2 for everyone; the descriptions (C2) and the business model (C1) with Option B.

YOU ENTER

- Yes or No for each of the ten sustainability issues – climate change, pollution, water and marine resources, biodiversity and ecosystems, circular economy, own workforce, workers in the value chain, affected communities, consumers and end-users, business conduct – across five columns: practices, policy, policy publicly available, future initiatives, targets.
- Option B: a brief description of each, whether it covers suppliers or clients, and the targets.
- Optional: the most senior level accountable (a person or a body).
- Option B: products and services, markets, main business relationships, the estimated number of suppliers and their sectors and countries, and any sustainability-related elements of your strategy.

THE WORKBOOK DOES

- Works out whether you have any practices, policies or initiatives (B2 ¶129).
- Asks for descriptions only where you answered Yes, and flags missing ones.
- Lays out the B2 matrix and the C1–C2 text in the report.

Before you move on “Practices” are what you do; “policies” are documented commitments; “future initiatives” are plans being implemented; “targets” monitor how policies are implemented. Answer every row – a blank is flagged.

VSME_Reporting_Suite_VS2026.xlsx

STEP 3 • POLICIES

Practices, policies and the business model

Answer Yes or No for every issue (B2). With Option B, describe what you have (C2) and the business model (C1).

WORKED EXAMPLE - fictitious entity, for reference only — enter your own figures in the template tabs (without “Example”).

A Practices, policies, future initiatives and targets (B2 ¶29-30; C2 ¶47)

Practices: what you do. Policies: documented commitments. Future initiatives: plans being implemented. Targets: to monitor how policies are implemented.

Sustainability issue	Practices?	Policy?	Policy publicly available?	Future initiatives?	Targets?	Brief description (C2 - Option B)	Covers suppliers or clients?	Targets - brief description (C2 - Option B)	Status
Climate change	Yes	Yes	Yes	Yes	Yes	Energy and carbon policy (2025): heat recovery on the boilers and compressor. LED lighting. 250 kWh rooftop solar PV, and a plan to replace the LPG forklifts with electric trucks by 2028.	No	Reduce Scope 1 and Scope 2 emissions by 42% by 2030 from a 2024 base year (see C3).	✓ OK
Pollution	Yes	Yes	No	No	No	Water-based inks and starch adhesives only; bundled storage and spill kits for oils; ISO 14001 operating procedures.	No		✓ OK
Water and marine resources	Yes	No		Yes	No	Process water metered at the Athy plant and starch-kitchen wash water reused. Rainwater harvesting for the starch kitchen is planned for 2027.	No		✓ OK
Biodiversity and ecosystems	Yes	No		No	No	Drainage interceptor and a riverbank buffer strip maintained along the boundary with the River Barrow.	No		✓ OK
Circular economy	Yes	Yes	Yes	Yes	Yes	Boxes made from 88% recycled fibre and designed for recycling; all board trim baled and returned to the paper mill; damaged pallets repaired and reused with customers.	Yes	Divert at least 95% of waste to recycling or preparation for reuse by 2027.	✓ OK
Own workforce	Yes	Yes	Yes	No	Yes	Health and safety management system; dignity at work policy and a training plan for every production role.	No	No lost-time accidents and at least 16 training hours per employee each year.	✓ OK
Workers in the value chain	Yes	Yes	Yes	No	No	Supplier code of conduct signed by the key paper, ink and transport suppliers.	Yes		✓ OK
Affected communities	Yes	No		No	No	Noise and HGV routing plan agreed with neighbours; work-experience places for local schools.	No		✓ OK
Consumers and end-users	Yes	Yes	No	No	No	Food-contact packaging made under a hygiene and product safety management system.	Yes		✓ OK
Business conduct	Yes	Yes	Yes	No	No	Anti-bribery and gifts policy and a protected disclosures (whistleblowing) procedure.	No		✓ OK
Practices, policies or initiatives in place (B2 ¶29)?	Yes								

B Accountability (C2 ¶48 - optional)

Most senior level accountable for these practices and policies (a person or a body):

Board of directors; day-to-day responsibility rests with the Operations Director

People Workforce Governance Evidence Index Dashboard Report Factor library VS v VSME 2024 Example - Setup Example - Sites Example - Policies

Policies: the B2 matrix for the ten issues with Option B descriptions.

Energy and greenhouse gas emissions

The heart of B3. Enter what the bills and logs say; the tab converts it to MWh and tCO₂e.

YOU ENTER

- **B Fuels and vehicles** (20 rows): a description, the fuel or vehicle chosen by name from the factor library, Stationary or Mobile, and the quantity. The unit comes from the factor. A renewable share is optional (for example for a biofuel blend you can evidence).
- **C Refrigerants** (8 rows): the equipment, the gas and the kilograms topped up or lost in the year, from the F-gas service log.
- **D Electricity, heat, steam and cooling** (12 rows): one row per supply – the location-based factor, the type (grid, on-site renewable, purchased heat or steam, purchased cooling), kWh, the renewable share, and optionally your own factor. For the market-based extra: the contractual instrument and any supplier factor.
- **A The residual mix factor**, only if you report market-based Scope 2.

THE WORKBOOK DOES

- Calculates MWh (net calorific value), renewable MWh and tCO₂e for every row, with the factor applied shown beside it.
- Builds the 2013 energy table – electricity and fuels, renewable and non-renewable – and the 2013 Scope 1 (stationary, mobile, fugitive) and location-based Scope 2 totals.
- Shows biogenic CO₂ from biofuels and biomass as a memo, outside the scopes.
- Adds market-based Scope 2 and GHG intensity if you switched the extras on.

Before you move on Every row must have a factor, a use and a quantity; the totals must reconcile to the rows (both are Dashboard checks). Prefer litres or kWh to kilometres – they are more accurate. For a shared building, allocate the landlord’s bill by floor area or contractual cost.

[illegible]

Energy & GHG: fuels and refrigerants converted with named factors.

WORKED EXAMPLE · fictitious entity, for reference only — enter your own figures in the template tabs (without "Example",

One row per supply. Renewable share: from the supplier's fuel mix disclosure, or 100% if backed by Guarantees of Origin. Shared buildings: allocate by floor area or contractual cost.

Supply (site and meter)	Location-based feed (from the library)	Type	Consumption (MWh)	Renewable share (%)	Gien factor (GJ/G2shvW)	Energy (MWh)	% of which renewable (%)	Local energy based (gcoch)	Contractual instrument (market based)	Seller (or COO/Salee)	Market based (ECOB)	
Athy plant – grid supply	IIE Grid electricity kWh SEAI 2025 (provisional)	Grid electricity	1,184,690	42.0%	-	1,184.6	497.5	211.2	Supplier specific factor - Self-generated renewable	-	0.23100	273.6
Athy plant – rooftop solar PV (self-consumed)	-	On-site renewable electricity	96,300	100.0%	-	96.3	96.3	-	-	-	-	-
Nias warehouse – green tariff	IIE Grid electricity kWh SEAI 2025 (provisional)	Grid electricity	142,800	100.0%	-	142.8	142.8	25.4	Guarantees of Origin (renewable)	-	-	-
Dublin office – landfill recharge (floor area)	IIE Grid electricity kWh SEAI 2025 (provisional)	Grid electricity	18,400	-	-	18.4	-	3.3	Residual mix (no instrument)	-	-	6.8

E Results (B3 ¶32-33)

Energy is final energy consumed; electricity includes purchased heat, steam and cooling. Emissions are gross – no deduction for offsets or removals

Energy consumption (MWh) – 532	Renewable	Non-renewable	Total
Electricity (as reflected in utility billings), heat, steam and cooling	736.6	705.5	1,442.1
Fuels	38.6	3,394.4	3,433.0
Total energy consumption	775.2	4,099.9	4,875.1
Representative share of total production			

Greenhouse gas emissions – T33	ICD09
Scope 1 – stationary combustion	400.4
Scope 1 – mobile combustion	137.4
Scope 1 – fugitive (refrigerants)	6.0
Scope 1 (T33(a))	723.9
Scope 2 – location-based (T33(b))	246.0
Total Scope 1 and 2 (location-based)	969.9
Scope 3 – where reported (E49–52, Climate tab)	3,341.1
Scope 3 – market-based (optional)	280.4
GHG intensity – ICD09 per million of turnover (additional)	51.7
Biogenic C2H4 from beef and biomas (memo, outside the scope)	

05

STEP 5 • CLIMATE

Scope 3, targets and climate risks

Comprehensive Module (Option B). Scope 3 is optional; targets and risks are reported if you have them.

YOU ENTER

- **A Scope 3** (optional): for each of the 15 GHG Protocol categories, whether it is relevant, the method (supplier-specific, average data, distance-based, spend-based, other), the activity or spend, unit, factor and its source – or a tCO2e figure from another tool.
- **B Targets:** for Scope 1, Scope 2 (location-based) and, if set, Scope 3 – base year and value, target year and value, unit and share of the scope covered; up to 5 main actions.
- **C Transition plan:** whether one has been adopted, or whether and when it will be.
- **D Climate risks** (6 rows): the hazard or transition event, its type, time horizon, what is affected and how exposure was assessed, adaptation action, and optionally the potential financial effect (high, medium, low).

THE WORKBOOK DOES

- Totals Scope 3 and presents it with B3, as ¶52 requires.
- Flags sectors likely to have significant Scope 3 from your NACE code.
- Calculates the reduction targeted and the change since the base year, using this year's Scope 1 and 2.
- Decides whether you are in a high climate impact sector (NACE sections A–H and M) and so whether the transition plan questions apply.

Before you move on If you report Scope 3, include the significant categories (¶51); customers often ask for categories 1, 4, 6, 7 and 9 first. EFRAG's guidance suggests interim targets (1–5 years) and long-term targets (2040 or 2050) with a recent, representative base year.

VSME_Reporting_Suite_VS2026.xlsx

STEP 5 • CLIMATE

Scope 3, targets and climate risks

Comprehensive Module (Option B). Scope 3 is optional; targets and risks are reported if you have them.

WORKED EXAMPLE - fictitious entity, for reference only – enter your own figures in the template tabs (without "Example").

A Scope 3 – value chain emissions (¶49–52, optional)

If reported, refer to the 15 GHG Protocol categories and include the significant ones (¶51). Enter an amount and a factor, or tCO2e from another tool.

Do you report Scope 3 emissions? ☒ Yes ☐ No Customers often ask for categories 1, 4, 6, 7 and 9 first.

Factor likely to have significant Scope 3? ☒ Likely ☐ Not likely From the NACE code: ag/food (A), manufacturing (C), construction (F), real estate (M in NACE Rev. 2.1) and packaging (B2.92).

Category	Relevant?	Method	Activity or spend	Unit	Factor (kg CO2e per unit)	Factor source	Calculated (tCO2e)	Or enter tCO2e	Reported (tCO2e)	Status
1 Purchased goods and services	Yes	Supplier-specific	10,480	board	525,000/Mt/cr carbon footprint declarations (2025)		5,502.0		5,502.0	OK
2 Capital goods	No									OK
3 Fuel- and energy-related activities	Yes	Average data			Well-to-tank and T&D factors on fuel and pow		168.0		168.0	OK
4 Upstream transportation and distribution	Yes	Distance-based	1,960,000	km	0.110 Hauliers' carbon statements		215.6		215.6	OK
5 Waste generated in operations	Yes	Average data			Waste contractor's report		21.0		21.0	OK
6 Business travel	Yes	Distance-based	186,000	passenger-km	0.150 Travel agency trip report		27.9		27.9	OK
7 Employee commuting	Yes	Average data	512,000	km	0.170 Staff commuting survey (car average)		87.0		87.0	OK
8 Upstream leased assets	No									OK
9 Downstream transportation and distribution	Yes	Distance-based	1,240,000	km	0.090 Hauliers' carbon statements		111.6		111.6	OK
10 Processing of sold products	No									OK
11 Use of sold products	No									OK
12 End-of-life treatment of sold products	Yes	Average data	9,950	sold	21,300 Average end-of-life factor for paper and board		211.9		211.9	OK
13 Downstream leased assets	No									OK
14 Franchises	No									OK
15 Investments	No									OK
Total Scope 3 reported									6,345.1	

B GHG reduction targets (C3 ¶53)

Targets in absolute values for Scope 1 and Scope 2, and for significant Scope 3 if you set them.

Have you set GHG emission reduction targets? ☒ Yes ☐ No EFRAG's guidance suggests interim targets (1–5 years) and long-term targets (2040 or 2050), with a recent, representative base year.

Scope	Base year	Base-year value	Target year	Target value	Unit	Share of the scope covered	Reduction targeted	This year	Change since the base year	Status
Scope 1	2024	812.0	2030	471.0	tCO2e	100.0%	42.0%	723.9	(10.9%)	OK
Scope 2 (location-based)	2024	268.0	2030	155.0	tCO2e	100.0%	42.2%	240.0	(10.5%)	OK
Scope 3 (if targets are set)										

Main actions to achieve the targets (¶53(e))

Action 1: New banners and an e-commerce on both steam boilers (2027)

Action 2: Replace the LPG forklift fleet with electric forklifts by 2028

Action 3: Extend the rooftop solar PV to 600 kWp (2027)

Action 4: Move company cars to battery electric at renewal

Action 5: Buy renewable electricity backed by Guarantees of Origin for all sites from 2027

Index Dashboard Report Factor library VS v VSME 2024 Example – Setup Example – Sites Example – Policies Example – Energy & GHG Example – Climate ...

Climate: Scope 3 by category, then the targets.

06

STEP 6 • ENVIRONMENT

Pollution, nature, water and waste

Basic Module metrics B4 to B7. Site names come from the Sites tab.

YOU ENTER

- **A Pollution** – only if you report pollutants to a competent authority or under an environmental management system: up to 8 pollutants with the medium (air, water, soil), amount and unit, or a link to the public document.
- **C Water** by site: metered or billed withdrawal, your share of a building total, or an estimate; and, if production uses water significantly, the discharge from production.
- **D Circular economy**: whether you apply the three principles and how.
- **E Waste** (15 streams): the List of Waste code, destination, hazardous or not, quantity in kg or tonnes, and the evidence.
- **F Material flows** – manufacturing, construction, packaging and similar sectors: up to 6 materials with their annual mass.

THE WORKBOOK DOES

- Lists the biodiversity sites (B) from the Sites tab and counts them.
- Calculates withdrawal and consumption (withdrawal less discharge), and water consumed at water-stress sites.
- Converts waste to tonnes and works out the hazardous and non-hazardous totals and the proportion diverted to recycling or preparation for reuse – energy recovery and backfilling do not count.

Before you move on Hazardous waste is the List of Waste codes marked with an asterisk (*). Use the destination on the waste contractor's report, not what you hope happened to it.

VSME_Reporting_Suite_VS2026.xlsx

STEP 6: ENVIRONMENT

Pollution, nature, water and waste

Basic Module environmental metrics B4 to B7. Site names come from the Sites tab.

WORKED EXAMPLE - fictitious entity, for reference only — enter your own figures in the template tabs (without "Example").

Artisullen Packaging Ltd
✓ All checks passed

E Waste (B7 §39(a)-(b))

Weight by stream. Hazardous: List of Waste codes with an asterisk (*). Diverted = sent to recycling or preparation for reuse – not energy recovery or backfilling.

Waste stream	LoW / EWC code	Destination	Hazardous?	Quantity	Unit	Evidence (weighbridge tickets, transfer notes)	Tonnes	Status
Corrugated board trim and rejects	15 01 01	Recycling	No	1,184.00	tonnes	Weighbridge tickets	1,184.00	✓ OK
Mixed paper and cardboard (warehouse)	15 01 01	Recycling	No	46.20	tonnes	Waste transfer notes	46.20	✓ OK
Damaged wooden pallets	15 01 03	Preparation for reuse	No	38.50	tonnes	Pallet repairer's dockets	38.50	✓ OK
Plastic strapping and stretch film	15 01 02	Recycling	No	9.80	tonnes	Waste transfer notes	9.80	✓ OK
Starch adhesive residue	16 03 06	Recycling	No	22.60	tonnes	Anaerobic digestion plant dockets	22.60	✓ OK
General waste (canteen and offices)	20 03 01	Energy recovery	No	31.60	tonnes	Waste transfer notes	31.60	✓ OK
Ink wash water	08 03 08	Other disposal	No	12.40	tonnes	Waste transfer notes	12.40	✓ OK
Waste machinery oils	13 02 09*	Recycling	Yes	1.90	tonnes	Hazardous waste consignment not	1.90	✓ OK
Fluorescent tubes and electrical waste	20 01 21*	Recycling	Yes	340.00	kg	Consignment notes	0.34	✓ OK
Oil rags and absorbents	15 02 02*	Energy recovery	Yes	0.80	tonnes	Hazardous waste consignment not	0.80	✓ OK
								–
								–
								–
								–
Total							1,348.14	

Total weight of waste generated (t) - §39(a) **1,348.14** in the value chain cap above 10 employees, with the proportion diverted.

of which hazardous (t) 3.04

of which non-hazardous (t) 1,345.10

Diverted to recycling or preparation for reuse (t) 1,303.34

Proportion diverted to recycling or preparation for reuse - §39(c) **96.7%**

F Material flows (B7 §39(c))

Only for sectors using significant material flows (for example manufacturing, construction, packaging): the annual mass of the relevant materials used.

Do you operate in a sector using significant material flows? ☒ Yes ☐ No Your NACE code (C17.21) points to Yes.

Material	Annual mass (t)	Notes (for example recycled content)	Status
Recycled containerboard (reels)	10,480.88%	recycled fibre content	✓ OK
Starch (adhesive)	412		✓ OK
Water-based inks	38		✓ OK
New wooden pallets	210		✓ OK

Report Factor library VS v VSME 2024 Example - Setup Example - Sites Example - Policies Example - Energy & GHG Example - Climate Example - Environment ...

Environment: waste streams, the totals and material flows.

07

STEP 7 • PEOPLE

Employee register

Paste from payroll or HR: one row per employee who worked for you at any time in the period. No names needed.

YOU ENTER

- Up to 1,000 rows: employee ID, gender, contract (permanent or temporary), country of contract, FTE, start date, leaving date (blank for current staff), reason for leaving, management level, collective agreement, apprentice or intern, annual gross pay, contracted hours per week and training hours in the period.

THE WORKBOOK DOES

- Checks every row and shows ✓ OK, ○ or ✗ in the Status column.
- Works out who was employed at the start and at the end of the period, who left, hourly pay and whether anyone is paid below the minimum wage.
- Feeds the employee number on Setup and every metric on the Workforce tab.

Before you move on “Employees” are people with an employment contract under national law – not self-employed contractors or agency workers, which go on Workforce F. Annual gross pay is base pay plus other pay available to all employees, in cash or in kind, for the hours in the next column. Apprentices and interns are left out of the minimum wage test.

VSME_Reporting_Suite_VS2026.xlsx

STEP 7 • PEOPLE

Employee register

Paste from payroll or HR: one row per employee who worked for you at any time in the period. No names needed.

WORKED EXAMPLE - fictitious entity, for reference only — enter your own figures in the template tabs (without “Example”).

✓ All checks passed

A Summary

Rows entered	66	Employees: people employed under an employment contract (national law) – not self-employed contractors or agency workers (enter those on Workforce F); FTE: contracted hours ÷ full-time hours (e.g. 25 ÷ 40 = 0.625). Annual gross pay: base pay plus other pay available to all employees, in cash or in kind, on an annual basis for the hours in the next column – used for the minimum wage test and the gender pay gap. Training hours: hours completed in the period. Apprentices and interns are left out of the minimum wage test.
Rows needing attention (○ or ✗)	0	
Employees at the end of the period (headcount)	60	
Full-time equivalents at the end of the period	59.4	
Employees who left during the period	6	

B Register

Leave the leaving date blank for current employees. Dates outside the period are allowed for start dates (people who joined earlier).

Employee ID	Gender	Contract	Country of contract	FTE	Start date	Leaving date	Reason for leaving	Management level?	Covered by a collective agreement?	Apprentice or intern?	Annual gross pay	Contracted hours per week	Training hours in the period	Status
E001	Male	Permanent	Ireland	1.00	01-Jan-2012			No	Yes	No	36,060	39.0	18.0	✓ OK
E002	Male	Permanent	Ireland	1.00	04-Feb-2013			No	Yes	No	38,550	39.0	20.0	✓ OK
E003	Male	Permanent	Ireland	1.00	01-Mar-2014			No	Yes	No	38,610	39.0	22.0	✓ OK
E004	Female	Permanent	Ireland	1.00	10-Apr-2015			No	Yes	No	40,860	39.0	18.0	✓ OK
E005	Male	Permanent	Ireland	1.00	13-May-2016			No	Yes	No	35,960	39.0	20.0	✓ OK
E006	Male	Permanent	Ireland	1.00	16-Jun-2017			No	Yes	No	36,730	39.0	22.0	✓ OK
E007	Male	Permanent	Ireland	1.00	19-Jul-2018			No	Yes	No	39,180	39.0	18.0	✓ OK
E008	Male	Permanent	Ireland	1.00	22-Aug-2019			No	Yes	No	38,900	39.0	20.0	✓ OK
E009	Male	Permanent	Ireland	1.00	25-Sep-2020			No	Yes	No	40,380	39.0	22.0	✓ OK
E010	Female	Permanent	Ireland	1.00	01-Oct-2021			No	Yes	No	38,840	39.0	18.0	✓ OK
E011	Male	Permanent	Ireland	1.00	04-Nov-2022			No	Yes	No	40,030	39.0	20.0	✓ OK
E012	Male	Permanent	Ireland	1.00	07-Dec-2023			No	Yes	No	40,280	39.0	22.0	✓ OK
E013	Male	Permanent	Ireland	1.00	10-Jan-2024			No	Yes	No	40,150	39.0	18.0	✓ OK
E014	Male	Permanent	Ireland	1.00	13-Feb-2012			No	Yes	No	39,100	39.0	20.0	✓ OK
E015	Male	Permanent	Ireland	1.00	16-Mar-2013			No	Yes	No	36,850	39.0	22.0	✓ OK
E016	Female	Permanent	Ireland	1.00	19-Apr-2014			No	Yes	No	39,280	39.0	18.0	✓ OK
E017	Male	Permanent	Ireland	1.00	22-May-2015			No	Yes	No	36,000	39.0	20.0	✓ OK
E018	Male	Permanent	Ireland	1.00	25-Jun-2016			No	Yes	No	40,590	39.0	22.0	✓ OK
E019	Male	Permanent	Ireland	1.00	01-Jul-2017			No	Yes	No	38,210	39.0	18.0	✓ OK
E020	Male	Permanent	Ireland	1.00	04-Aug-2018			No	Yes	No	40,580	39.0	20.0	✓ OK
E021	Male	Permanent	Ireland	1.00	07-Sep-2019			No	Yes	No	39,730	39.0	22.0	✓ OK
E022	Female	Permanent	Ireland	1.00	10-Oct-2020			No	Yes	No	39,690	39.0	18.0	✓ OK
E023	Male	Permanent	Ireland	1.00	13-Nov-2021			No	Yes	No	36,650	39.0	20.0	✓ OK
E024	Male	Permanent	Ireland	1.00	16-Dec-2022			No	Yes	No	36,910	39.0	22.0	✓ OK
E025	Female	Permanent	Ireland	1.00	19-Jan-2023			No	Yes	No	41,660	39.0	18.0	✓ OK
E026	Male	Permanent	Ireland	1.00	22-Feb-2024			No	Yes	No	41,310	39.0	20.0	✓ OK
E027	Male	Temporary	Ireland	1.00	02-Mar-2026			No	Yes	No	34,960	39.0	10.0	✓ OK
E028	Female	Temporary	Ireland	1.00	02-Apr-2026			No	Yes	No	35,290	39.0	10.0	✓ OK
E029	Male	Temporary	Ireland	1.00	02-May-2026			No	Yes	No	34,500	39.0	10.0	✓ OK
E030	Male	Temporary	Ireland	1.00	02-Jun-2026			No	Yes	No	33,790	39.0	10.0	✓ OK
E031	Male	Permanent	Ireland	1.00	01-Sep-2025			No	No	Yes	23,930	39.0	60.0	✓ OK

VS v VSME 2024 Example – Setup Example – Sites Example – Policies Example – Energy & GHG Example – Climate Example – Environment Example – People

People: the employee register from payroll, with a check on every row.

08 STEP 8 • WORKFORCE

Workforce metrics

Calculated from the register, plus the incident log and a few settings (B8–B10 and C5).

YOU ENTER

- **A Settings:** standard annual hours of a full-time employee, actual hours worked if recorded, the applicable minimum wage per hour (in Ireland €14.15 from 1 January 2026, S.I. No. 472/2025), an optional average headcount, and whether you employ people in more than one country.
- **C Countries** (up to 6), if you employ people in more than one country.
- **D Incident log** (12 rows): what happened, date, accident or ill health, days of absence, fatal or not.
- Whether you are required by law to report the gender pay gap; optionally a direct Yes or No for the minimum wage; self-employed and agency workers at the period end.

THE WORKBOOK DOES

- Breaks employees down by contract type and gender (B8) and by country.
- Decides which cases are recordable – an accident causing death or more than three days' absence; ill health causing death or any absence – and calculates the accident rate.
- Calculates the minimum wage test, the unadjusted mean gender pay gap, collective bargaining coverage, average training hours and the employee turnover rate, and the female-to-male ratio at management level.

Before you move on Rate = recordable accidents ÷ hours worked × 200,000 (or 1,000,000). Turnover = leavers ÷ average headcount. Training = total hours ÷ headcount at the period end. The pay gap is reported only if the law requires you to report it (VS ¶42(b)).

VSME_Reporting_Suite_VS2026.xlsx

STEP 8 • WORKFORCE

Workforce metrics

Calculated from the employee register, plus the incident log and a few settings.

WORKED EXAMPLE - fictitious entity, for reference only — enter your own figures in the template tabs (without "Example").

D Health and safety - employees (B9 ¶41)

Log every work-related accident and case of ill health. Recordable: an accident causing death or more than three days' absence; ill health causing death or any absence (Appendix A).

What happened	Date	Type	Days of absence	Fatal?	Recordable?	Status
Hand cut from a box knife (first aid only)	12-Feb-2026	Accident	0	No	No	✓ OK
Back strain while changing a paper reel	03-Apr-2026	Accident	6	No	Yes	✓ OK
Foot injury – forklift collision in the warehouse	22-Jul-2026	Accident	14	No	Yes	✓ OK
Wrist fracture – slip on a wet floor	09-Oct-2026	Accident	21	No	Yes	✓ OK
Contact dermatitis (starch kitchen)	18-Nov-2026	Ill health	2	No	Yes	✓ OK

Number of recordable work-related accidents (¶41(a)) **3** In the value chain cap.

Hours worked by employees **109,450** Actual hours (A).

Rate of recordable work-related accidents (¶41(a)) – per 200,000 hours worked **5.48** Number = hours worked × 200,000 (100 full-time employees) or × 1,000,000 (Setup D).

Fatalities from recordable work-related accidents and ill health (¶41(b)) **0** Subject to legal restrictions.

E Remuneration, collective bargaining and training (B10 ¶42)

(a), (c) and (d) are in the value chain cap. Gross hourly pay = annual gross pay ÷ (weekly hours × 52).

Employees paid below the applicable minimum wage (excluding apprentices and interns) **0** Everyone employed at any time in the period, using the rate in A.

Or answer (a) directly, if pay data are not in the register Leave blank to use the register.

(a) Do employees receive pay equal to or above the applicable minimum wage? **Yes**

Example – Setup Example – Sites Example – Policies Example – Energy & GHG Example – Climate Example – Environment Example – People **Example – Workforce** ...

Workforce: the incident log, the accident rate and the B10 metrics.

09

STEP 9 • GOVERNANCE

Business conduct and human rights

B11 for every report; C6 to C9 with Option B.

YOU ENTER

- **A B11:** the number of convictions and the total fines for corruption or bribery in the period (0 if none).
- **B C6:** whether you have a code of conduct or human rights policy for your workforce, the matters it covers, and a complaints-handling mechanism.
- **C C7:** confirmed human rights incidents in your workforce and in the value chain.
- **D C8:** whether you are active in prohibited weapons, tobacco, fossil fuels (coal, oil, gas) or agrochemicals, and the revenue.
- **E C9:** female, male and other members of the governance body.

THE WORKBOOK DOES

- Calculates the share of turnover for each C8 activity.
- Calculates the board gender diversity ratio (female ÷ male members).
- Runs the optional Paris-aligned benchmark test if you switched the extras on.

Before you move on Report only confirmed incidents – per EFRAG’s guidance, evidenced and subject to a formal finding by a court, the OECD or an administrative authority. Fines are those recognised in the financial statements for the period.

VSME_Reporting_Suite_VS2026.xlsx

STEP 9 • GOVERNANCE

Business conduct and human rights

B11 for every report; C6 to C9 with Option B.

WORKED EXAMPLE - fictitious entity, for reference only — enter your own figures in the template tabs (without “Example”).

A Convictions and fines for corruption and bribery (B11 ¶43)

Final court convictions and fines imposed by a court or authority in the period. Enter 0 if none.

Number of convictions in the period

Total amount of fines incurred in the period

Fines recognised in the financial statements for the period (EFRAG guidance).

B Human rights policies and processes - own workforce (C6 ¶61)

(a) Do you have a code of conduct or human rights policy for your own workforce? In the value chain cap above 10 employees.

(b)(i) If yes, does it cover child labour?

(b)(ii) ... forced labour?

(b)(iii) ... human trafficking?

(b)(iv) ... discrimination?

(b)(v) ... accident prevention?

(b)(vi) ... other matters?

Other matters covered – specify

(c) Do you have a complaints-handling mechanism for your own workforce? In the value chain cap above 10 employees.

C Human rights incidents (C7 ¶62)

Confirmed incidents only: per EFRAG’s guidance, evidenced and subject to a formal finding by a court, the OECD or an administrative authority.

(a)(i) Confirmed incidents in your own workforce involving child labour? (a)(i)–(v) are in the value chain cap above 10 employees.

(a)(ii) ... forced labour?

(a)(iii) ... human trafficking?

(a)(iv) ... discrimination?

(a)(v) ... other?

Other incidents – specify

(b) Actions taken to address the incidents (optional)

(c) Are you aware of confirmed incidents involving workers in the value chain, affected communities, consumers or end-users identified in the period?

Example – Sites Example – Policies Example – Energy & GHG Example – Climate Example – Environment Example – People Example – Workforce **Example – Governance** ...

Governance: B11 and the C6–C7 answers.

10

STEP 10 • EVIDENCE

Evidence and review tracker

Be ready when a customer, bank or assurance provider asks “how do you know?”. One row per datapoint.

YOU ENTER

- For each datapoint: an owner, the data source, where the evidence is filed, its status (not started, requested, received, evidence filed, reviewed), who reviewed it and when.
- Findings (12 rows): anything you could not support, an estimate to improve or a reviewer’s comment, with severity, action, owner, due date and status.

THE WORKBOOK DOES

- Greys out the datapoints that do not apply to you.
- Suggests, for every datapoint, what a customer, bank or assurer typically asks to see.
- Calculates readiness – reviewed datapoints as a share of those that apply – and counts open findings.

Before you move on Have someone other than the preparer review each datapoint. No assurance is required under the Standard, but customers and lenders increasingly check the figures they receive.

VSME_Reporting_Suite_VS2026.xlsx

STEP 10 - EVIDENCE

Evidence and review tracker

Be ready when a customer, bank or assurance provider asks “how do you know?”. One row per datapoint.

WORKED EXAMPLE - fictitious entity, for reference only — enter your own figures in the template tabs (without “Example”).

A Readiness

Datapoints that apply to you	52	No assurance is required under the Voluntary Standard, but customers and lenders increasingly check the figures they receive. Give each datapoint other than the preparer review it. Log anything you could not support as a finding, with an action and a date. Column K lists what a reviewer type
with evidence filed or reviewed	50	
reviewed	45	
Readiness – reviewed as a share of those that apply	86.5%	
Open findings	2	
of which high severity	0	

B Datapoints

Rows that do not apply to you are shown in grey. Status: Not started - Requested - Received - Evidence filed - Reviewed.

Code	Datapoint	Applies to you	Owner	Data source	Evidence reference or location	Status	Reviewed by	Review date
B1.27a	Option selected and statement of compliance	Yes	Finance Manager	Board minutes	Board minutes 12 Feb 2027, item 4	Reviewed	Managing Director	12-Feb-2027
B1.27b	Disclosures omitted under §22	Not applicable						
B1.27c	Individual or consolidated basis	Yes	Finance Manager	Company register	Group structure – single company	Reviewed	Managing Director	12-Feb-2027
B1.27d	Subsidiaries covered and their registered addresses	Not applicable						
B1.27e-i	Legal form	Yes	Finance Manager	Financial statements 2026	Signed financial statements, p. 8–10	Reviewed	Managing Director	12-Feb-2027
B1.27e-ii	NACE sector classification code(s)	Yes	Finance Manager	Financial statements 2026	Signed financial statements, p. 8–10	Reviewed	Managing Director	12-Feb-2027
B1.27e-iii	Total assets	Yes	Finance Manager	Financial statements 2026	Signed financial statements, p. 8–10	Reviewed	Managing Director	12-Feb-2027
B1.27e-iv	Turnover	Yes	Finance Manager	Financial statements 2026	Signed financial statements, p. 8–10	Reviewed	Managing Director	12-Feb-2027
B1.27e-v	Number of employees (headcount or FTE)	Yes	HR Manager	Payroll system	Payroll headcount report 31 Dec 2026	Reviewed	Managing Director	12-Feb-2027
B1.27e-vi	Country of primary operations and significant assets	Yes	Finance Manager	Fixed asset register	FAR by site, 2026	Reviewed	Managing Director	12-Feb-2027
B1.27e-vii	Geolocation of sites owned, leased or managed	Yes	Operations Director	Leases and deeds: map view	Site list with map extracts	Reviewed	Managing Director	12-Feb-2027
B1.28	Sustainability-related certifications or labels	Yes	Operations Director	Certificates	ISO 14001 and chain-of-custody certificate	Reviewed	Managing Director	12-Feb-2027
B2.29	Practices, policies, future initiatives and targets	Yes	Managing Director	Policy register	Policy register v3 (Dec 2026)	Reviewed	Managing Director	12-Feb-2027
B3.32-1	Total energy consumption (MWh)	Yes	Operations Director	Utility bills; fuel cards	Energy file 2026 (bills, dockets, statements)	Reviewed	Managing Director	12-Feb-2027
B3.32-2	Energy breakdown: renewable and non-renewable (if the information can be obtained)	Yes	Operations Director	Supplier statements	Fuel mix 2025; GO statement; inverter log	Evidence filed		
B3.33a	Scope 1 GHG emissions (tCO2e)	Yes	Operations Director	This workbook: F-gas log	Energy & GHG tab; F-gas log 2026	Reviewed	Managing Director	12-Feb-2027
B3.33b	Scope 2 GHG emissions – location-based (tCO2e)	Yes	Finance Manager	Bills; service charge	Electricity bills; landlord recharge 2026	Reviewed	Managing Director	12-Feb-2027

Example – Energy & GHG Example – Climate Example – Environment Example – People Example – Workforce Example – Governance **Example – Evidence** Example – Index ...

Evidence: owner, source, evidence and review status for every datapoint.

11

STEP 11 • INDEX

Datapoint index and value chain cap

Every disclosure of the Standard as 59 datapoints, plus the extras. Nothing to enter – it is fully calculated.

YOU ENTER

- Nothing. The Index reads your answers on every other tab.

THE WORKBOOK DOES

- For each datapoint: the VS paragraph, the VSME 2024 paragraph, its type, the ≤ 10 tag, both value chain cap lists, whether it applies to you, its status, the reported value and a link to where it is entered.
- Status: ✓ reported · ○ missing · ◆ omitted under ¶22 · – not applicable, not selected, or optional and not reported.
- Summarises what applies, what is still missing and how much of your cap is reported.

Before you move on “Still missing” must be 0 before you finish: report each missing datapoint or omit it under ¶22 on Setup G.

VSME_Reporting_Suite_VS2026.xlsx

STEP 11: INDEX

Datapoint index and value chain cap

Every disclosure of the Voluntary Standard as 59 datapoints, plus the extras listed side for Fully calculated.

WORKED EXAMPLE - fictitious entity, for reference only – enter your own figures in the template tabs (without “Example”).

A Summary

Datapoints that apply to you

Of which reported

Still missing – must be reported or omitted under §22

Omitted under §22

Optional or voluntary datapoints you chose to report

In your value chain cap

Of which reported

52

52

8

0

30

30

B All datapoints

CSRD – optional · If applicable = only in the stated circumstances · May = voluntary · §228 = voluntary for undertakings with 10 employees or less.

Code	DR	VS 1 (2026/2026)	VSME 2024 1	Datapoint	Type	≤10	Cap 10	Cap >10	In your cap	Applies to you	Status	Reported value	Where
B1.27a	B1	27(a)	24(a)	Option selected and statement of compliance	Shall	✓	✓	✓	Yes	Yes	✓ Reported	Option B – Basic and Comprehensive	Setup 2
B1.27b	B1	27(b)	24(b)	Disclosures omitted under §22	If applicable	–	–	–	Not applicable	–	Not applicable	0 datapoints omitted	Setup 2
B1.27c	B1	27(c)	24(c)	Individual or consolidated basis	Shall	✓	✓	✓	Yes	Yes	✓ Reported	Individual	Setup 2
B1.27d	B1	27(d)	24(d)	Subsidiaries covered and their registered addresses	If applicable	–	–	–	Not applicable	–	Not applicable	–	Setup 2
B1.27e	B1	27(e)	24(e)	Legal form	Shall	✓	✓	✓	Yes	Yes	✓ Reported	Private company limited by shares (LTD, Inc)	Setup 2
B1.27f	B1	27(f)	24(f)	NACE sector classification code(s)	Shall	✓	✓	✓	Yes	Yes	✓ Reported	C17.21	Setup 2
B1.27g	B1	27(g)	24(g)	Total assets	Shall	✓	✓	✓	Yes	Yes	✓ Reported	€12,300,000	Setup 2
B1.27h	B1	27(h)	24(h)	Turnover	Shall	✓	✓	✓	Yes	Yes	✓ Reported	€18,640,000	Setup 2
B1.27i	B1	27(i)	24(i)	Number of employees (headcount or FTE)	Shall	✓	✓	✓	Yes	Yes	✓ Reported	60 (headcount)	Setup 2
B1.27j	B1	27(j)	24(j)	Country of primary operations and significant assets	Shall	✓	✓	✓	Yes	Yes	✓ Reported	Ireland	Setup 2
B1.27k	B1	27(k)	24(k)	Geolocation of sites owned, leased or managed	Shall	✓	✓	✓	Yes	Yes	✓ Reported	3 sites	Setup 2
B1.28	B1	28	25	Sustainability-related certifications or labels	If applicable	–	–	–	Not applicable	–	Not applicable	–	Setup 2
B1.29	B2	29-30	26	Practices, policies, future initiatives and targets	If applicable	–	–	–	Not applicable	–	Not applicable	–	Setup 2
B3.32.1	B3	32 (first sentence)	29	Total energy consumption (MWh)	Shall	✓	✓	✓	Yes	Yes	✓ Reported	4,875.1 MWh	Energy & GHG 2
B3.32.2	B3	32 (table)	29	Energy breakdown: renewable and non-renewable (if the information can be obtained)	If applicable	✓	✓	✓	Yes	Yes	✓ Reported	15.9% renewable	Energy & GHG 2
B3.33a	B3	33(a)	30(a)	Scope 1 GHG emissions (tCO2e)	Shall	✓	✓	✓	Yes	Yes	✓ Reported	723.9 tCO2e	Energy & GHG 2
B3.33b	B3	33(b)	30(b)	Scope 2 GHG emissions – location-based (tCO2e)	Shall	✓	✓	✓	Yes	Yes	✓ Reported	240.0 tCO2e	Energy & GHG 2
B3.34	B4	34	32	Emissions of pollutants to air, water and soil	If applicable	–	–	–	Not applicable	–	Not applicable	–	Environment 2
B5.35	B5	35	33	Sites in or near biodiversity-sensitive areas, with the area's name	If applicable	–	–	–	Not applicable	–	Not applicable	–	Site 2
B6.36	B6	36	35	Total water withdrawal	Shall	✓	✓	✓	Yes	Yes	✓ Reported	8,004 m³	Environment 2
B6.37.1	B6	37 (first sentence)	36	Water consumption (significant water users)	If applicable	✓	✓	✓	Yes	Yes	✓ Reported	1,430 m³	Environment 2
B6.37.2	B6	37 (second sentence)	36	Water consumed at sites in areas with water stress	If applicable	✓	✓	✓	Yes	Yes	✓ Reported	0 m³	Environment 2
B7.38	B7	38	37	Whether and how circular economy principles are applied	Shall	✓	✓	✓	Yes	Yes	✓ Reported	Yes	Environment 2
B7.39a	B7	39(a)	38(a)	Total weight of waste, hazardous and non-hazardous	Shall	✓	✓	✓	Yes	Yes	✓ Reported	1,348.1 t	Environment 2
B7.39b	B7	39(b)	38(b)	Proportion of waste diverted to recycling or preparation for reuse	Shall	✓	✓	✓	Yes	Yes	✓ Reported	95.7%	Environment 2
B7.39c	B7	39(c)	38(c)	Annual mass flow of relevant materials (material flow sectors)	If applicable	✓	✓	✓	Yes	Yes	✓ Reported	4 materials	Environment 2
B8.40a	B8	40(a)	39(a)	Employees by type of contract (temporary, permanent)	Shall	✓	✓	✓	Yes	Yes	✓ Reported	55 permanent, 4 temporary	People 2
B8.40b	B8	40(b)	39(b)	Employees by gender	Shall	✓	✓	✓	Yes	Yes	✓ Reported	45 male, 15 female	People 2
B8.40c	B8	40(c)	39(c)	Employees by country of contract (more than one country)	If applicable	✓	✓	✓	Yes	Yes	✓ Reported	2 countries	Workforce 2
B9.41a	B9	41(a)	41(a)	Number and rate of recordable work-related accidents	Shall	✓	✓	✓	Yes	Yes	✓ Reported	3 (rate 5.48)	Workforce 2

Example – Climate

Example – Environment

Example – People

Example – Workforce

Example – Governance

Example – Evidence

Example – Index

Example – Dashboard

...

Index: every datapoint, whether it applies, its status and the value chain cap.

12

STEP 12 · DASHBOARD

Dashboard and checks

The year at a glance, how ready the report is, and every check in one place.

YOU ENTER

- Nothing.

THE WORKBOOK DOES

- Sixteen tiles: energy, Scope 1, Scope 2, Scope 1 + 2, Scope 3, water, waste, employees, accident rate, collective bargaining, training, pay gap, datapoints reported, value chain cap, evidence reviewed and open findings.
- Two charts: emissions by source and the energy mix.
- Seventeen checks, each pointing to the tab and section to fix.

Before you move on Work down the checks until “Checks needing attention” is 0. The status line on every tab then turns to “✓ All checks passed”.

VSME_Reporting_Suite_VS2026.xlsx			
STEP 12 · DASHBOARD			
Dashboard			
The year at a glance, how ready the report is, and every check in one place.			
WORKED EXAMPLE · fictitious entity, for reference only — enter your own figures in the template tabs (without “Example”).			
A At a glance			
Reporting period: 1 January 2026 to 31 December 2026			
TOTAL ENERGY	SCOPE 1	SCOPE 2 · LOCATION-BASED	SCOPE 1 + 2
4,875	723.9	240.0	963.9
MWh · 16% renewable	tCO ₂ e · direct emissions	tCO ₂ e · market-based 280.4	tCO ₂ e · 51.7 per million turnover
SCOPE 3	WATER WITHDRAWAL	WASTE	EMPLOYEES
6,345	8,084	1,348.1	60
tCO ₂ e · 8 categories	m ³ · consumption 1,630	tonnes · 97% recycled or reused	headcount at the period end
ACCIDENT RATE	COLLECTIVE BARGAINING	TRAINING	GENDER PAY GAP
5.48	63%	17.7	5.0%
3 recordable · per 200,000 hours	of employees covered	hours per employee	unadjusted, mean hourly pay
DATAPPOINTS REPORTED	VALUE CHAIN CAP	EVIDENCE REVIEWED	OPEN FINDINGS
52 / 52	30 / 30	87%	2
nothing missing · 5 optional reported	reported of those a customer can ask for	of datapoints that apply	0 high severity
Example – Climate Example – Environment Example – People Example – Workforce Example – Governance Example – Evidence Example – Index Example – Dashboard			

Dashboard: the year at a glance.

13

STEP 13 • REPORT

The sustainability report

Ready to print from row 7. Everything is linked – change the inputs, not this tab.

YOU ENTER

- Nothing. Change an input and the report updates.

THE WORKBOOK DOES

- Opens with the statement of compliance, then B1 to B11 and, with Option B, C1 to C9, Scope 3 and any extras you selected.
- Leaves lines that do not apply blank and uses your choices (GWP basis, boundary, accident-rate basis, turnover basis) in the wording.

Before you move on Print it or save it as PDF (File ► Print, or File ► Save as ► PDF). Read it through once on paper: it is what your customer or bank will see.

VSME_Reporting_Suite_VS2026.xlsx

STEP 13 • REPORT

Sustainability report

Ready to print from row 7. Everything is linked – change the inputs, not this tab.

Ardculen Packaging Ltd

✓ All checks passed

WORKED EXAMPLE • fictitious entity, for reference only — enter your own figures in the template tabs (without "Example").

Ardculen Packaging Ltd

Sustainability report

Voluntary Standard – Commission Delegated Regulation (EU) 2026/1560 • Option B • 1 January 2026 to 31 December 2026

Ardculen Packaging Ltd has prepared this sustainability report for the period 1 January 2026 to 31 December 2026 in accordance with the sustainability reporting standard for voluntary use set out in Annex I to Commission Delegated Regulation (EU) 2026/1560 (the Voluntary Standard), applying Option B (Basic Module and Comprehensive Module). The report has been prepared on an individual basis.

B1 Basis for preparation

Option selected	Option B – Basic and Comprehensive Modules
Basis of preparation	Individual sustainability report
Legal form	Private company limited by shares (LTD), incorporated in Ireland
NACE code(s)	C17.21
Principal activities	Design and manufacture of corrugated cardboard boxes, shelf-ready packaging and protective inserts for food, drinks and e-commerce customers in Ireland and the UK
Total assets	€14,260,000
Turnover	€18,640,000
Number of employees	60 (headcount, at 31 December 2026)
Country of primary operations	Ireland
Location of significant assets	Manufacturing plant and corrugator line at Athy, Co. Kildare (owned); finished-goods warehouse at Naas, Co. Kildare (leased)
Financial statements	Audited financial statements for the year ended 31 December 2026
Information omitted (¶22)	None

Example – Environment Example – People Example – Workforce Example – Governance Example – Evidence Example – Index Example – Dashboard **Example – Report**

Report: the statement of compliance and B1, laid out for print.

Factors, units and estimates

Choosing an emission factor

On the Energy & GHG tab you choose each factor by name, for example “IE · Road diesel (average biofuel blend) · litre · SEAI 2025”. The prefix tells you the source: IE = Ireland (SEAI), UK = United Kingdom (DESNZ), Any = vehicle factors per kilometre (DESNZ, reflecting the UK fleet). Use the factor for your reporting year, or the latest one published.

IN THE LIBRARY	CONTENTS
Fuels and vehicles	SEAI 2025 (provisional) for Ireland; DESNZ 2025 and 2026 for the UK; vehicle factors per km (DESNZ 2026); wood pellets and logs.
Electricity	SEAI’s generation-only grid factor for Ireland (2024 and 2025 provisional) and DESNZ UK grid factors (2025 and 2026).
Refrigerants	Nine gases including R-410A, R-32, R-134a, R-404A, R-407C, two HFOs, CO2 and SF6, with AR5 and AR6 values.
Your own	Rose rows for 6 fuels, 4 electricity or heat supplies and 3 gases – for other countries, a supplier’s factor or district heating.

Gas billed in kWh

Irish and UK gas bills show gross kWh. Choose the “kWh (gross, as billed)” factor and enter the billed kWh: the workbook converts to net calorific value for energy, as EFRAG’s guidance uses net values.

Global warming potentials

CO2, CH4 and N2O are kept separately and combined on the basis you choose on Setup D: AR5 (as DESNZ and EPA Ireland) or AR6 (recommended by the GHG Protocol). SEAI factors are CO2 only; the small CH4 and N2O components come from DESNZ for the same fuel.

Refrigerants

Leaks equal the refrigerant topped up in the year, from the F-gas service log. If a unit was not topped up and lost nothing, it has no emissions to report.

Electricity: location- and market-based

The Standard requires location-based Scope 2: the grid factor for each supply. On-site solar counts once, as renewable electricity, with no emissions. Transmission and distribution losses belong in Scope 3.

Market-based Scope 2 is an optional extra: Guarantees of Origin count as zero, a supplier-specific factor is used where you have one, and otherwise the residual mix you enter from the AIB European Residual Mixes (published each May) – the workbook does not hold it.

Estimates

Estimates are allowed where measurement is not possible – for example your share of a shared building’s water bill, or hours worked from standard annual hours. Say how you estimated, and improve it next year: log it as a finding on the Evidence tab.

Factors change every year The library holds factors as published by October 2026. When SEAI or DESNZ publish new values, add them in the rose rows of the Factor library and pick them by name.

The finishing checklist

CHECK	WHERE
☐ The status line reads “✓ All checks passed” on every tab.	Any tab
☐ “Still missing” is 0: every datapoint that applies is reported or omitted under ¶12.	Index A
☐ Your value chain cap datapoints are all reported.	Index A, Dashboard
☐ Turnover, total assets and the period agree to the signed financial statements.	Setup A–B
☐ Every datapoint has an owner and its evidence filed; someone other than the preparer has reviewed it.	Evidence B
☐ Open findings are resolved, or you are comfortable disclosing the estimate.	Evidence C
☐ Your choices are as you intend: GWP basis, boundary, accident-rate basis, turnover basis.	Setup D
☐ The statement of compliance reads correctly.	Setup H, Report
☐ The report has been read through on paper and approved by management or the board.	Report

Sharing the report

Save the Report tab as PDF and send it to the customer or bank that asked. The report’s primary purpose is to inform business counterparties; if you decide to publish it, it can be a separate section of your management report or a separate document (¶20). If a customer sends a questionnaire instead, answer it from the Report and the Index – the VSME 2024 column helps when the questionnaire still quotes VSME paragraph numbers.

Next year

- Keep this year’s workbook and evidence: they are your comparatives and your audit trail.
- Start a fresh copy for the new year. From the second year, the Standard requires the previous year’s figures alongside this year’s (¶14), except for metrics reported for the first time. The Report tab shows the current year, so take last year’s figures from last year’s workbook and present them beside the new ones in your final document.
- Update the factors in the Factor library as SEAI, DESNZ and AIB publish new values.

Common questions

Do we need Option B?

No. Option A (the Basic Module) is the minimum. Choose Option B if a customer, bank or investor asks for Comprehensive Module information – business model, targets, climate risks, human rights, revenues from certain activities, board diversity – or if you want to show it. You can switch on Setup B at any time; the workbook updates what applies.

We have 10 employees or fewer. What can we leave out?

The 20 datapoints tagged [Voluntary for undertakings with 10 employees or less] – including energy, Scope 1 and 2, water, circular economy and waste – become optional. Everything else still applies when relevant. The Index shows the result once you enter the preceding year's average on Setup C.

A large customer has sent a long ESG questionnaire. Do we have to answer all of it?

If you have up to 1,000 employees and the request is for the customer's CSRD reporting, Directive (EU) 2026/470 gives you the right to decline information beyond the voluntary standard, and Annex II of Regulation 2026/1560 lists that cap for financial years beginning on or after 1 January 2027. Member States transpose the Directive by 19 March 2027. The Index shows which datapoints are in your cap. You can still choose to share more.

Is the report audited or assured?

No assurance is required under the Voluntary Standard. The workbook helps you keep evidence and a review trail, but it does not provide assurance, and Wide GAAP does not review the figures you enter.

Do we have to report Scope 3?

No, it is optional. If you report it, refer to the 15 GHG Protocol categories and include the significant ones. The Climate tab multiplies the amounts and factors you supply, or takes a tCO₂e figure from another tool.

Does it produce the EFRAG Digital Template or XBRL?

No. The workbook is a preparation tool with its own report layout. If a customer asks for the digital format, transfer the figures from the Report tab into EFRAG's template.

Can a UK company use it?

Yes. The factor library includes DESNZ factors for UK sites, and the Standard is voluntary and defined by size rather than country (¶12), so UK suppliers to EU customers can use it.

Can we use it for a group?

Yes. Choose the consolidated basis on Setup B and list up to 8 subsidiaries with their registered addresses. Enter the group's sites, energy, waste and employees across the tabs.

Which software do we need?

Microsoft Excel 2010 or later for Windows, or Excel 2011 or later for Mac. There are no macros. The workbook is built for Excel; other spreadsheet applications are not supported.

Something does not fit our business. What then?

Use the comment and description cells to explain, record judgements on the Evidence tab, and check the Instructions tab (sections E and F) for the conventions and limitations the workbook applies.

IMPORTANT

Your report, your responsibility

The VSME Reporting Suite is a do-it-yourself workbook. You prepare the sustainability report with it and remain responsible for it; Wide GAAP does not prepare, review or assure reports for users of the workbook, and buying it does not create an engagement or an adviser relationship. It does not replace the Voluntary Standard, EFRAG's guidance or professional judgement.

Emission factors are reproduced from public sources (SEAI, DESNZ, IPCC, GHG Protocol) with attribution and change every year – check for updates. Check the results before relying on them and keep your own evidence. References are to Commission Delegated Regulation (EU) 2026/1560 as published on 21 September 2026 and to EFRAG's guidance as at October 2026. All names in the worked example are fictitious.